

# EXHIBIT 31

**In the Matter Of:**  
**Fair Fight vs Raffensperger**

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**Robyn Roberts**

*November 22, 2019*

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3200 COBB GALLERIA PARKWAY  
SUITE 265  
ATLANTA, GA 30339

1 Wellesley College Road, Decatur, Georgia, 30030 is  
2 essentially a conflation of both your home address  
3 and your daughter's address --

4 A. It is.

5 Q. - at school, or former address at  
6 school?

7 And again, sitting here today, I  
8 understand you delivered the voter registration  
9 document. You are not able to testify as to what  
10 information was on the form that your daughter  
11 provided, correct?

12 A. I cannot.

13 Q. Okay. Do you know if your daughter has  
14 had an opportunity to vote since the 2018 runoff  
15 election?

16 A. Yes, one time.

17 Q. Okay.

18 A. Just recently.

19 Q. Okay. That was earlier this month?

20 A. Yes.

21 Q. Do you know if she did vote in that  
22 election?

23 A. She did.

24 Q. Okay. And how did she vote then?

25 A. In person.

1 Q. Did she have any issues voting in person?

2 A. No, sir.

3 Q. Okay. You indicated earlier that one of  
4 the reasons, or the reason that you submitted your  
5 declaration is that you wanted to notify the  
6 County of people not getting their absentee  
7 ballots, correct?

8 A. Correct.

9 Q. Do you know if DeKalb County is a  
10 Defendant in this action?

11 A. I do not know.

12 Q. Do you know who the Defendants in this --

13 A. But, I mean, the Board of Elections I  
14 assume.

15 Q. The DeKalb County Board of Elections?

16 A. I would assume, since they're part of the  
17 election system in the state of Georgia.

18 Q. Okay. And again, I'm not, not trying to  
19 play games or ask you to assume things. Do you  
20 know - and believe me, your Notice of Deposition  
21 has the Secretary of State, Brad Raffensperger on  
22 there presumably where he is a Defendant in this  
23 action. Do you know any of the other Defendants?

24 A. I don't think I do.

25 Q. Okay. Are you aware of - and I believe